

ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

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Implementation of Sections 309(j) and
337 of the Communications Act of 1934
as Amended

WT Docket No. 99-87

Promotion of Spectrum Efficient
Technologies on Certain Part 90
Frequencies

RM-9332

Establishment of Public Service Radio
Pool in the Private Motile
Frequencies Below 800 MHz

RM-9405

Petition for Rule Making of The American
Mobile Telecommunications Association

RM-9705

To: The Commission

COMMENTS OF MRFAC, INC.

MRFAC, Inc. ("MRFAC"), by its counsel, hereby offers comments on one aspect of the Further Notice of Proposed Rule Making in the above proceeding, i.e. a conversion to narrowband (12.5 kHz) technology. In support MRFAC submits the following:

INTRODUCTION

As the Commission is aware, MRFAC and its predecessor-in-interest have been private land mobile coordinators for nearly 50 years. Starting with its roots in the National Association of Manufacturers, and continuing with its creation as an independent, non-profit corporation in 1976, MRFAC has coordinated applications for many thousands of manufacturers and industrial applicants.

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Besides its coordination functions MRFAC serves as an advocate for the spectrum needs of private, internal use system operators. These entities are typically large industrial firms which own and operate radio facilities as an integral part of their operations. Their radio facilities are used in all manner of specialized applications in order to enhance employee productivity and safety. Moreover, many large manufacturers utilize their communications facilities to provide emergency public health and safety services to neighboring communities.

DISCUSSION

MRFAC is a member of the Land Mobile Communications Council ("LMCC") which is filing comments on the Further Notice this date. The LMCC filing supports the principle of a mandatory conversion to 12.5 kHz, but stops short of recommending a specific date for conversion. MRFAC supports LMCC's filing but comments separately in order to express its views on an appropriate conversion date and related issues.

In MRFAC's view, the conversion date should be January 1, 2005 -- the date when 162-174 MHz Federal systems are to convert to 12.5 kHz. *NTIA Manual of Regulations and Procedures for Federal Radio Frequency Management* (May/September 2000 revision), at Section 4.3.7.A, p. 4-178. By this date incumbents which have not converted their wideband systems to 12.5 kHz equipment, or systems with efficiency equivalent to narrowband, should assume secondary status.¹ No new wideband systems (except those with efficiency equivalent to narrowband) should be licensed after this date except on a secondary basis.

In addition, a January 1, 2005 date will provide fair and adequate notice to incumbent licensees to make the conversion. And it will help ameliorate a precipitous surge in demand, and hence price inflation, for narrowband equipment induced solely by regulatory fiat.

¹ Equivalent efficiency is defined in terms of one voice path per 12.5 kHz channel or equivalent, and data systems with a rate of at least 9600 bps per 12.5 kHz, or equivalent.

Insofar as any further narrowbanding is concerned (i.e. to 6.25 kHz), MRFAC urges that this question be deferred until 2010 so that industry and the Commission can evaluate the effects of the conversion to 12.5 kHz. Any 6.25 kHz conversion order at this point would be entirely premature and unwarranted.

Finally, MRFAC urges that equipment vendors be precluded from marketing or importing 25 kHz equipment (except that which is also capable of operating on 12.5 kHz channels or with efficiency equivalent to 12.5 kHz) from and after January 1, 2004. Vendors have been familiar with the issues presented here for years and, indeed, have been among the leading proponents of a mandatory conversion approach, the costs of which will be borne uniquely by users. It is thus entirely fit and proper that vendors should be called upon to do their part to help more fully realize the benefits of the conversion they have sought.

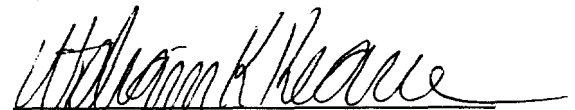
CONCLUSION

For the foregoing reasons, MRFAC urges that the Commission adopt as a date certain for conversion January 1, 2005; and that any consideration of a conversion to narrower equipment (i.e. 6.25 kHz) be deferred until 2010.

Respectfully submitted,

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March 5, 2001